

Email Attachment From: Dr. Urs Niggli and Otto Schmid, Socio-Economic Research Group

Subject: Comments to the Proposed Amendments to the National List of Allowed and prohibited substances of the National Organic Programm

USDA Document 7 CFR Part 205 / Docket Number TM-02-03

Dear Mr. Mathews,

Dear sirs,

The USDA has published April 16, 2003 in the Federal Register Vol. 68, No. 73 the proposed amendments to the National List of Allowed and Prohibited Substances of the US National Organic Program and has invited comments from interested parties, including from other countries.

The Research Institute of Organic Agriculture FiBL in Frick (Switzerland) welcomes the opportunity to comment these proposals. FiBL has concerns with the change of the USDA rule because we are engaged in several projects dealing with harmonisation of international rules and requirements for Organic Agriculture.

The harmonisation of the use of inputs in Organic Agriculture on a world-wide level is important with regard to equivalency for the international trade with organic products. Strong deviations from international rules and guidelines for Organic Agriculture such as IFOAM Basic Standards and Codex Alimentarius Guidelines could create problems on the market place.

Our comments are referring to substances, proposed to be added that might conflict with international harmonisation.

It is acknowledged that the following substances have been proposed to take up in the new national list in the National Organic Program, as this reflects the common practise: agar-agar, carageenan and tartaric acid for processing of organic food.

However the following substances deviate from Government regulations and private sector e standards for Organic farming:

- Methionine as feedstuff: not allowed because practical experiences that the amino acids requirements can be met by certified organic and non-synthetic sources.
- Sodium Nitrate: this fertiliser is not allowed for any purpose by all European certifiers.
- Copper Salts: there are no limitations (amounts per ha) to minimize the accumulation of heavy metals.
- Ethylene: the use is not allowed for pineapple flower induction.

We ask you kindly to reconsider these comments in the light of the above mentioned problems.

Yours sincerely

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